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8 *Attorney for Defendant, Sallie Mae Bank, incorrectly identified in Plaintiff's Complaint as "Sallie Mae"*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 EDALIA SULLIVAN,

Case No.: 2:24-cv-02299-MDC

12 Plaintiff,

13 vs.

14 TRANS UNION LLC; EXPERIAN  
15 INFORMATION SOLUTIONS, INC.;  
16 INNOVIS DATA SOLUTIONS, INC.;  
17 CLARITY SERVICES, INC.;  
18 BACKGROUNDCHECKS.COM LLC; and  
19 SALLIE MAE,

20 Defendants.

**STIPULATION AND ORDER  
TO SET TIME TO FILE  
RESPONSIVE PLEADING**

**[First Request]**

21 IT IS HEREBY STIPULATED between Plaintiff Edalia Sullivan ("Plaintiff") and Defendant  
22 Sallie Mae Bank, incorrectly identified in Plaintiff's Complaint as "Sallie Mae" ("SMB") (collectively  
23 the "Parties"), by and through their undersigned counsel of record, as follows:

- 24 1. On December 11, 2024, Plaintiff filed a Complaint [ECF No. 1].
- 25 2. On December 18, 2024, Plaintiff filed a First Amended Complaint, adding SMB as a  
26 defendant [ECF No. 9].
- 27 3. On January 6, 2025, SMB was served with a copy of the Summons [ECF No. 10] and the  
28 original Complaint [ECF No. 1].
4. Upon information and belief, the First Amended Complaint has not been served on SMB, and  
Plaintiff has not filed anything on the docket evidencing service of the First Amended  
Complaint on SMB.

- 1 5. Pursuant to Federal Rule of Civil Procedure 15(a)(3), because the First Amended Complaint  
2 has not been served, SMB does not presently have a deadline to respond to the First  
3 Amended Complaint.
- 4 6. However, for ease of administration of this case, SMB is willing to waive service to secure a  
5 date certain for the responsive pleading deadline to the First Amended Complaint.
- 6 7. To allow SMB to further evaluate the claims, the Parties agree to set the deadline for SMB to  
7 answer, move, or otherwise respond to the First Amended Complaint up to and including  
8 February 14, 2025.
- 9 8. This is the Parties' first request, and it is not intended to cause any delay or prejudice to any  
10 party.

11 IT IS SO STIPULATED.

12  
13 FREEDOM LAW FIRM

14 /s/ Gerardo Avalos

15 George Haines, Esq.  
16 Nevada Bar No. 9411  
17 Gerardo Avalos, Esq.  
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21 *Attorney for Plaintiff Edalia Sullivan*

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14 /s/ Robert A. Riether

15 Robert A. Riether, Esq.  
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19 *Attorney for Defendant Sallie Mae Bank,*  
20 *incorrectly identified in Plaintiff's Complaint as*  
21 *"Sallie Mae"*

22 **ORDER**

23 IT IS SO ORDERED.

24  
25  
26   
27 Hon. Maximiliano D. Couvillier III  
28 United States Magistrate Judge  
Date: 1/27/2025